#### BEFORE THE

# REC'D TN TENNESSEE REGULATORY AUTHORITY

'99 FEB 12 PM 2 04

In re:		OFFICE OF THE EXECUTIVE SECRETARY
BellSouth Telecommunications, Inc. Tariff	)	
To Offer Residential Customers a New Toll	)	Docket No. 98-00307
Optional Calling Plan to Provide 25 Cent Calls	)	

### **MOTION TO INTERVENE**

## OF SPRINT COMMUNICATIONS COMPANY L.P.

COMES NOW Sprint Communications Company L.P. ("Sprint"), pursuant to T.C.A. Sec. 4-5-310, and hereby petitions the Tennessee Regulatory Authority ("Authority") for leave to intervene and participate as a party in the above-captioned tariff proposed by BellSouth Telecommunications, Inc. ("BellSouth"). In support of this Motion, Sprint states as follows:

- 1. Sprint is authorized to provide interexchange and competitive local exchange service in the State of Tennessee.
- 2. Sprint's ability to offer intraLATA toll service and local exchange service in competition with BellSouth will be directly impacted by the tariff proposed in the above-stated Docket. BellSouth's tariff in Docket No. 98-00307 proposes to offer residential customers a new toll optional calling plan in which customers are charged a monthly fee of \$4.95 and \$.25 for each eligible intrastate intraLATA toll call. Mileage distances and length of call do not generally affect the rate charged. Wholesale

customers are charged access to the retail customer on a per minute of use basis rather

than the flat rate option proposed here and creates an obvious opportunity for

discrimination among BellSouth's customers. Accordingly, as a wholesale customer of

BellSouth, Sprint's substantial interests will necessarily be affected by the Commission's

determinations in this proceeding.

3. Accordingly, Sprint requests that it be granted leave to intervene and

participate fully as a party in this Docket. Sprint's participation will allow it to present

issues and develop facts that will assist the Authority in considering the potential impact

of the BellSouth proposal. Sprint's intervention and participation as a party will not

delay or in any way hinder the handling of this Docket.

WHEREFORE, in view of the foregoing, Sprint respectfully requests that it be

granted leave to intervene and participate fully as a party of record.

Respectfully submitted this 10th day of February, 1999.

Carolyn Zaturn Roddy

Carolyn Tatum Roddy

Sprint Communications Company L.P.

3100 Cumberland Circle- GAATLNO802

Atlanta, Georgia 30339

(404) 649-6788

Its Attorney

2

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the Motion to Intervene of Sprint Communications Company L.P. in Docket No. 98-00307 has been served by United States First Class Mail, postage prepaid upon the following:

James P. Lamoureux AT&T 1200 Peachtree St., NE, #4068 Atlanta, GA 30367

Jon E. Hastings, Esquire Boult, Cummings, et al. P.O. Box 198062 Nashville, TN 37219-8062 Vincent Williams, Esquire Consumer Advocate Division 426 5<sup>th</sup> Avenue, N., 2<sup>nd</sup> Floor Nashville, TN 37243

Guy Hicks
BellSouth Telecommunications Inc.
Suite 2101
333 Commerce Street
Nashville, TN 37201-3300

This 10th day of February, 1999.

Danielle Etzbach

Sprint Communications Company L.P.

**External Affairs**